AGRICULTURAL ANALYSIS

TM 5401RPL1

ER 04-08-036

Prepared for

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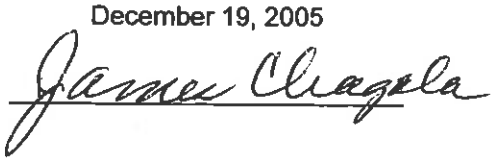

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I. INTRODUCTION

A. Overview of the Project:

This project proposes an 8 lot Major Subdivision with parcels ranging in size from 1.0 to 2.53 acres gross and a density of one dwelling unit per 1.28 gross acres. The entire property consists of 10.27 acres, located approximately .25 miles northeast of the intersection of Buena Creek Road and Monte Vista Road (See Figure1). There will be no other discretionary permits required for implementation.

B. San Diego County General Plan and Zoning:

The property is within the Current Urban Development Area (CUDA) Plan Category of the San Diego County Regional Land Use Element. It is also located in the North County Metropolitan Subregional Planning Area and has a plan designation of (2) Residential, which permits a density of 1 dwelling unit per acre. The property is currently classified with the RR1 Use Regulation with maximum density of 1 dwelling unit per acre and a minimum lot size of .5 acres.

C. Characteristics of the Subject Property:

The property generally slopes from north to south, with elevations as high as 805 feet in the northern area to 575 feet in the southern area. The subject property currently has no agriculture uses on the site.

D. Method and Survey Limitations

1. Method:

The primary source for agricultural information was a digitized aerial photo taken in February of 2004 and the Department of Conservation Important Farmlands Map 2002. These sources were enlarged so that agriculture and Important Farmlands on the property could be identified and measured. Please note that the measurements taken were two-dimensional and do not account for topography. Therefore there may be slight deviations in some of the acreage figures. However, this method was deemed sufficiently accurate for the broad conclusions desired in this analysis.

2. Limitations:

Acreages were measured through the use of a digital planimeter. All measurements were taken 3 times and the results averaged, in accordance with accepted practice for this type of instrument. For the broad assumptions of this report, this level of precision is more than sufficient. However, it should be understood that the acreage figures are only close approximations.

F. Threshold of Significance:

The San Diego County Department of Planning and Land Use has run the Land Evaluation and Site Assessment (LESA) Model for the project site, and based on the outcome of the model, as well as other information on file with the Department of Planning and Land Use, it was determined that this project would not result in significant project-level impacts to agricultural resources (See Appendix C). Thus the only threshold of significance to be considered in this report deals with the cumulative impact this project may have in terms of agriculture. This threshold is stated below:

This project, in conjunction with other existing and proposed projects, would have an impact to agriculture that is cumulatively considerable pursuant to the State CEQA Guidelines.

II. CUMULATIVE IMPACTS

Section 15130(a) of the State CEQA Guidelines states that cumulative impacts of a project should be discussed when the project impacts, even though individually limited, are cumulatively considerable. Cumulatively considerable means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

The following questions are listed in the CEQA Guidelines, Appendix G and are to be considered in evaluating cumulative agricultural impacts.

1. *Would the project convert prime farmland, unique farmland, or farmland of statewide importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California resources Agency, to nonagricultural use?*

   The project will convert 5.9 acres of farmland of statewide importance to non-agricultural uses. The effect of this conversion at the project level has been addressed through the application of the LESA Model, and the conclusion was that the project would not have a significant impact.

2. *Would the project conflict with existing zoning for agricultural use or a Williamson Act Contract?*

   The subject property does not have agricultural zoning, but there is agricultural zoning to the south across Buena Creek Road. However, this use regulation is not an exclusive agriculture zone, and permits a variety of other uses. There is no use proposed for the project that would not be permitted in the agricultural zones surrounding it.

   Additionally there are no parcels in the vicinity subject to a Williamson Act Contract.

3. *Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of farmland to nonagricultural use?*

   The issue of the project involving other changes to the environment that could result in conversion of farmland to nonagricultural use has been addressed through the application of the LESA Model, and the conclusion was the project would not have a significant impact

4. *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)*

This study has been done to determine if this project, combined with other projects in the vicinity, would have an impact that is cumulatively considerable. This was determined by identifying the projects that have been recently approved or are currently being processed by the County of San Diego, and then with the addition of the proposed project, reviewing the potential cumulative effect associated with agricultural conversion in the project vicinity.

A. Methodology:

An area was chosen which would function as a potential cumulative impact area. (For purposes of this report, this area will be referred to as the "Cumulative Study Area".) The boundaries of this area were established by reviewing features of the landscape, which may isolate agricultural in this vicinity from other agricultural areas in the county. These landscape features were primarily major areas of steep slope that would separate agricultural areas, major areas where no agricultural activity was taking place, and areas that had had substantial urban development.

The cumulative study area was superimposed on the San Diego County GIS Discretionary Permit Map.

This map indicates Major and Minor Subdivisions, Major Use Permits, General Plan Amendments (GPAs), and Plan Amendment Authorizations (PAAs) both proposed and approved since approximately January of 1999. (Major Use Permits for cellular antenna sites were not included due to the very small area that is affected with these projects.) This results in a gross number of projects in the study area. In this way the selected projects could be identified that had been approved and were contemplated over the last 5.5 years.

A map of the cumulative study area was overlain with the County Vegetation Map to determine which of the projects identified in the study area were ones that occurred on lands used for agriculture. To make this determination, any subdivision occurring on vegetation classified as agriculture or developed and disturbed land was considered. Disturbed and developed land was considered because the land may have originally been in agriculture, with the developed classification being a result of the

subdivision. Since the GIS Map only used points to identify projects, any project even remotely close to agriculture or urban vegetation types was considered.

The next step was to identify those approved and proposed projects that are occurring on land currently used for agriculture that have or would have an effect on Principal Farmlands within the cumulative study area. For purposes of this study, the term "Principal Farmlands" are those land referenced in the first threshold on Page 3 of this report, which include Prime Farmlands, Farmlands of Statewide Importance, and Unique Farmlands per the California Department of Conservation Important Farmlands Map 2002. This was done by overlaying the cumulative study area with the appropriate portions of the important farmlands map. Projects not within a Principal Farmland were also eliminated from consideration. As above, the GIS Map only used points to identify projects, and projects even remotely close to principal agricultural lands were considered.

The Maps and Plot Plans for those projects meeting both of the above tests were then obtained from the County Project Processing Counter. The maps were then superimposed on the vegetation and farmlands maps to determine the Principal Farmlands in agriculture that were affected. (Projects meeting the parameters previously discussed will be referred to as "Selected Projects".) The effect of the subject property could then be added to the agricultural lands affected by the selected projects. This could be compared with the land in agriculture for the County as a whole. In this way a determination could be made if the cumulative affect of the subdivisions in the cumulative study area was having a considerable cumulative impact on agriculture in San Diego County as a whole.

It should be noted that where agricultural studies have been previously done, the effects were taken directly from that report. Where agricultural studies have not been previously done or located, the entire area of the selected project within agriculture and a Principal Farmland was considered, even though it is possible that only a small part of that area was actually receiving a direct effect.

The data within this report was based upon the County GIS Discretionary Permit Map dated August 2004. It is understood that prior to the final decision, the discretionary permits will be reviewed in light of updated maps. At that point, it will then be decided if there are changes which warrant disclosure to the decision making body.

B. The Cumulative Analysis:

The subject property is located in the eastern part of the North County Metropolitan Subregional Planning Area near the City of Vista. The cumulative study area is bounded by the city limits of Vista on the west and north, the City of San Marcos on the south, and the topographic features to the east and northeast, which generally separate this area from the Twin Oaks Valley portion of the North County Metropolitan Subregional Area. The cumulative study area is some 5,103 acres in size and is shown on Figure 2.

The County General Plan shows a regional category of Current Urban Development (CUDA) over all of the area. The General Plan Designation for this area varies from (14) Service Commercial to (1) Residential at one dwelling unit per acre depending upon slope. The designation with the largest area is (2) Residential at one dwelling unit per acre with no slope restriction. Areas along SR 78 are generally a mixture of higher density residential and commercial designations.

Zoning in this area is primarily Rural Residential north of Buena Creek Road, and ~~Light~~ Limited Agriculture south of Buena Creek Road. The vast majority of this area has developed into 1 and 2-acre parcels in accordance with the Plan Designations. There are larger parcels toward the east as you approach the Twin Oaks Valley Area.

About 5% or roughly 255 acres of the cumulative study area is used for agriculture, with these uses primarily in the north and eastern portions of the area. The majority of the cumulative study area is developed or disturbed. There are some vacant areas as you approach the eastern boundaries.

The area immediate to the subject property (2000 foot radius from the center of the property) is about 10 to 15% in agriculture. This agricultural activity is predominately aging citrus groves and greenhouses. The prices for citrus products have dropped in recent years to the point where many of the citrus groves have a negative cash flow. These groves are being removed or no longer maintained, and there are virtually no new plantings of citrus on a large scale. A number of greenhouse operations have been established in this area after moving from the coastal areas, and their high value products means that they will likely be economically viable in the immediate future.

Climate in this region is that of the inland San Diego County with slightly more rainfall and more extremes in climate than the coastal area. However, the climate is still very mild, and the mild nature is the primary reason for the agriculture that exists in the cumulative study area.

About 12.6% of the soils in the cumulative study area are classified as one of the important farmlands by the California Department of Conservation, with the majority of the remainder being classified as "Other Lands," which are developed or not useful for agriculture. The majority of the important farmlands are in the far eastern portion of the cumulative study area near the Twin Oaks Valley Area.

Water is currently provided by the Vista Irrigation District. The District has indicated that there is sufficient water available for this proposal.

After reviewing projects which met the criteria described under "Methodology" it was determined that 2 selected projects were occurring on lands that were being used for agriculture and were on a Principal Farmland as previously defined. Appendix A has a listing of the initial group of subdivisions, those in agricultural or urban vegetation types, and those having one of the three Farmlands classifications. The selected projects affect 9.4 acres of the Principal Farmlands and are listed with acreages in Appendix B. The subject property does not technically meet the definition of a selected project because it is not in agriculture. However, for discussion purposes, it has been included in the calculations and the analyses. The subject proposal would affect 5.9 acres of principal farmlands, and when included with the other selected projects, there is an effect on 15.3 acres in the Cumulative Study Area. Figure 3 indicates the location of the selected projects.

C. Agriculture in San Diego County:

According to the Department of Conservation, in 2000 and 2002, the following acreages in the Principal Farmlands existed as in San Diego County.

	2000	2002
Prime Farmland	10,257	10,019
Farmland of Statewide Importance	13,142	13,000
Unique Farmland	57,306	57,030
Total	80,705	80,049

This represents a reduction of 656 acres or 1% in Principal Farmlands between 2000 and 2002. However, the 2002 Crop Statistics and Annual Report of the County of San Diego Department of Weights & Measures

indicate that within the period from 2000 to 2002 there was an increase of 20,662 acres or 9% of land in agricultural lands. Thus while there was a decrease in the Principal Farmlands, the County is experiencing a substantial increase in overall agricultural acreage.

1. Effect of the subject property on the cumulative study area.

   The result of the development of the subject property will be to create lots sizes and densities similar to ~~what most of the planning in~~ the cumulative study area ~~requires~~.

   Additionally, <u>while there has been truck farming on this property at one time,</u> there is currently no agriculture on the subject property and very little in the surrounding area

2. Effect to San Diego County Agriculture as a whole.

   In terms of San Diego County Agriculture as a whole, the 3 selected projects affect 9.4 acres of the Principal Farmlands, not including the subject property. Thus, absent the subject property, the Principal Farmlands affected amount to .012% of the Principal Farmlands within the County. When included with the 5.9 acres of the subject property, approximately 15.3 acres, or .019% of the principal farmlands within the County of San Diego, would be converted.

D. Summary:

In terms of a cumulative effect to the cumulative study area, the subject property will have minimal effects. The parcels are sized so they are consistent with the development as planned by the General Plan. Additionally, there is currently no agriculture on the subject property and very little in the surrounding area

In terms of cumulative effect to San Diego County, the subject property affects 5.9 acres of the Principal Farmlands. Adding the 3 additional selected projects meeting the parameters of this study amounts to a cumulative total of 15.3 acres. This amounts to a total of .019% of the Principal Farmlands in San Diego County. Considering this small amount with the fact that the overall agricultural acreage in San Diego County increased 20,662 acres from 2000 to 2002, there will not be a cumulatively

considerable impact to agricultural resources in San Diego County as a result of the development of the subject project.

III. THRESHOLD OF SIGNIFICANCE

A threshold of significance has previously been identified and is addressed below:

This project, in conjunction with other existing and proposed projects, would have an impact to agriculture that is cumulatively considerable pursuant to the State CEQA Guidelines.

The Cumulative Study Area covers 5,103 acres and is located in an urbanizing area of San Diego County. When considering all projects with impacts to agricultural resources that are located within the Cumulative Study Area, 15.3 acres, or .019% of San Diego County's Principal Farmlands are affected.

Thus there is a cumulative impact of Principal Farmlands in San Diego County of under .1% for an agricultural area covering 5,103 acres; however, it has been determined that this cumulative impact is not cumulatively considerable when considering the fact that 20,662 acres of farmland have been added in San Diego County from 2000 to 2002. When considering the project's impacts in combination with the other projects in the cumulative study area against the much larger increase in farmlands in the county, there is not a cumulatively considerable impact to agricultural resources in San Diego County as a result of the development of the subject project.

Therefore this threshold of significance stated above has not been met and there are no significant cumulatively considerable impacts to agricultural resources.

IV. FIGURES

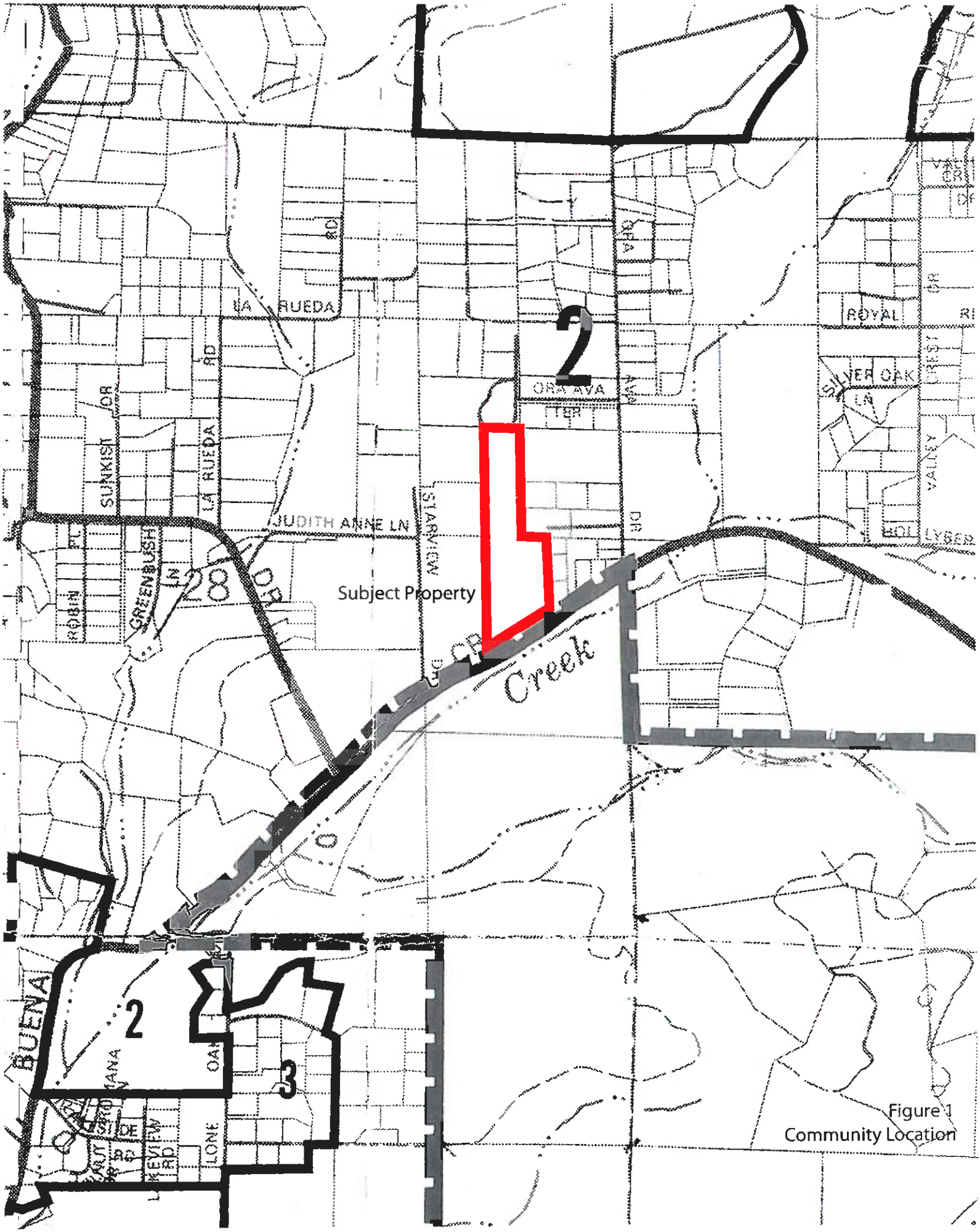

Figure 1
Community Location

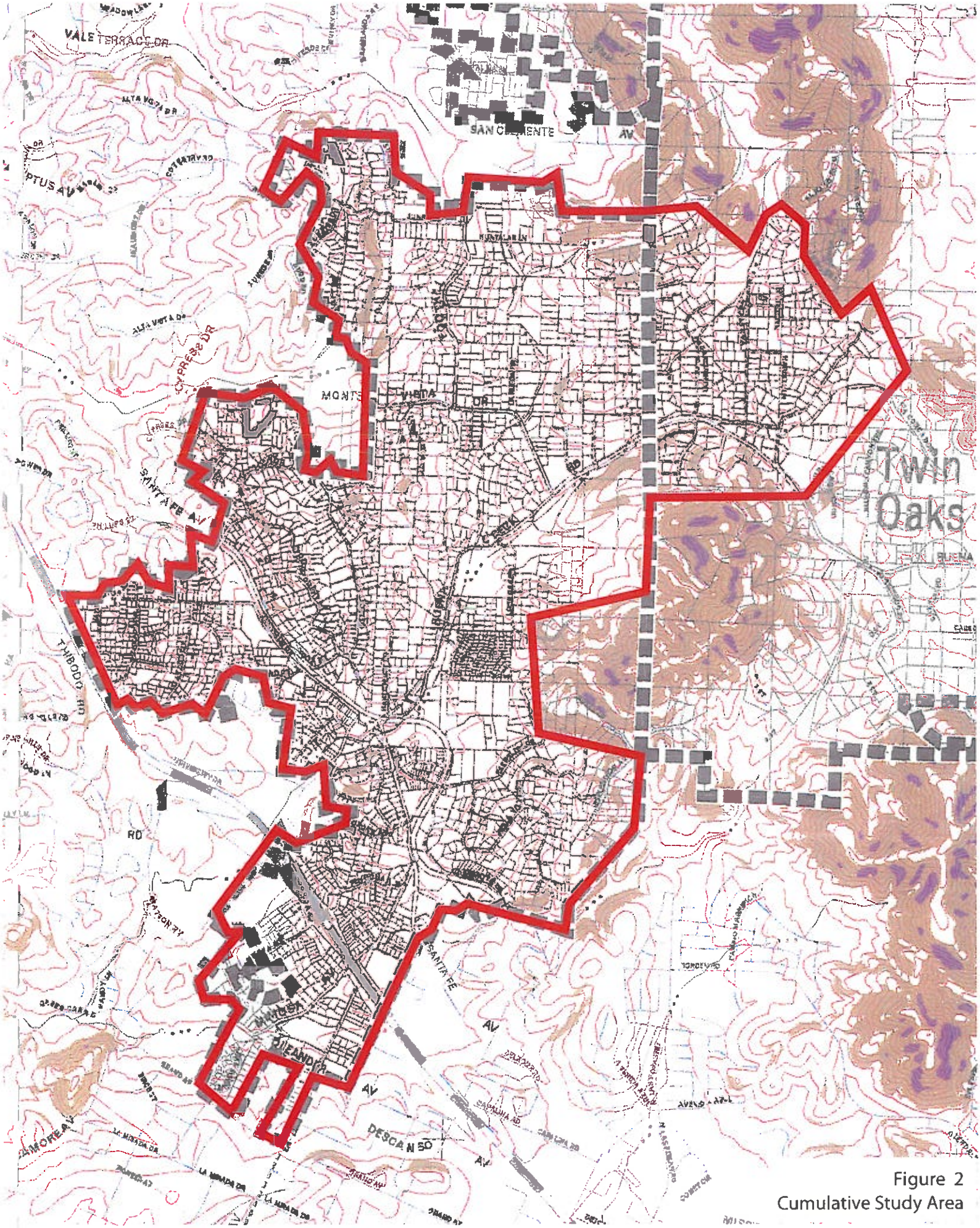

Figure 2
Cumulative Study Area

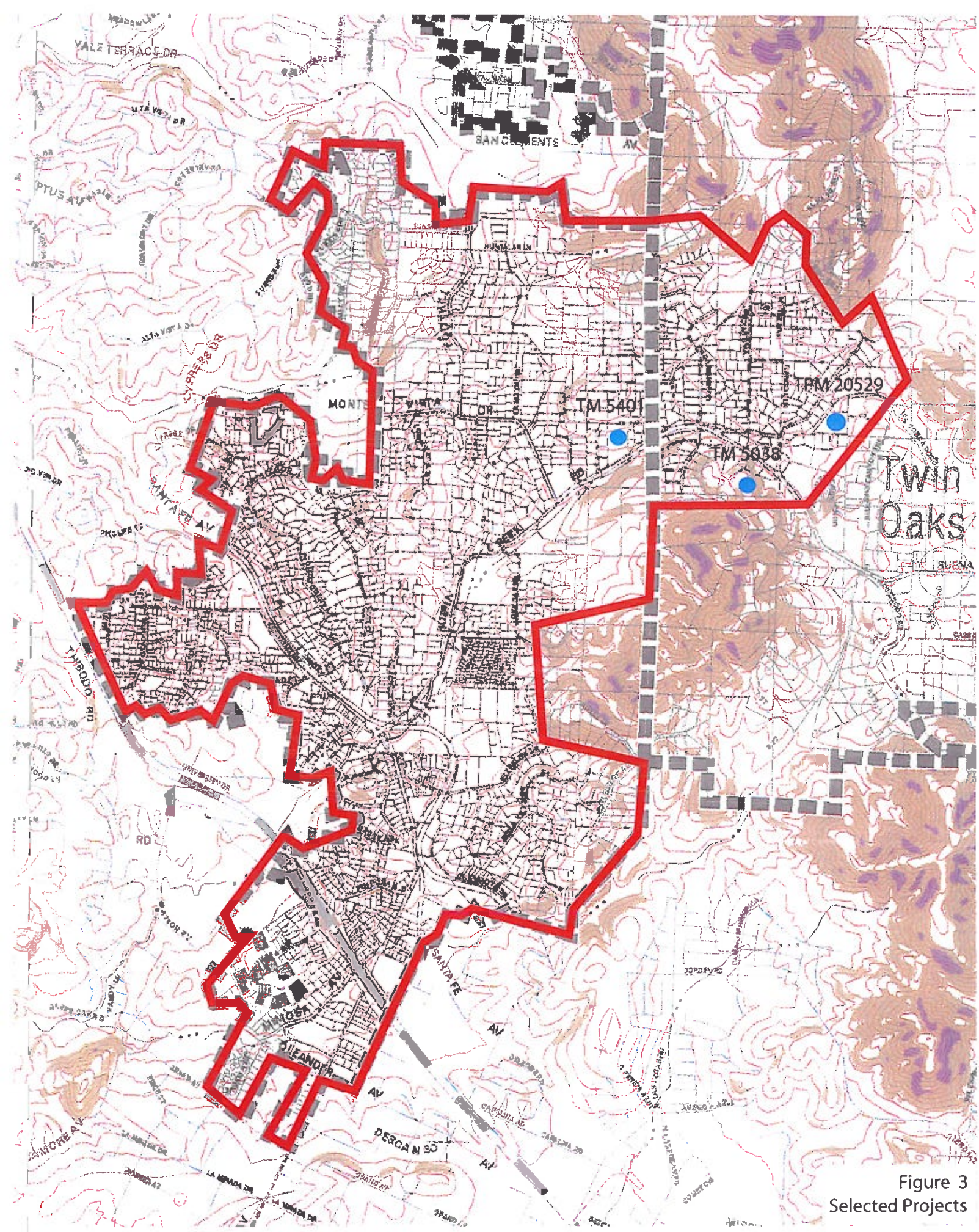

Figure 3
Selected Projects

V. STATEMENT OF QUALIFICATIONS

The following participated in this study:

James Chagala—Principal Planner

Education: B.A. in Sociology
M.S. in Urban Geography
Ph.D. in Urban Geography

Experience: 34 years as a professional planner
2 years Regional Planner with the East-West Gateway Coordinating Council
26 years with Department of Planning and Land Use
5 years as Chief of the Long Range Planning Division
10 years as Chief of the Current Planning Division
12 years as staff to the County Planning Commission
6.5 years operating a private planning consultant practice

12 years as Adjunct Professor at San Diego State University
3 years as Adjunct Professor at California State University at San Marcos

Placed on the San Diego County Environmental Consultant List in the field of Agriculture on November 14, 2001.

Eric Chagala—Planning Technician

Experience: 6 years as Planning Technician for a private planning consulting firm

Jennifer Carter—Planning Technician

Appendix A

Applications Filed within the Potential Cumulative Impact Area.	Applications on Agricultural or Disturbed Lands.	Applications on Agricultural or Disturbed Lands and Classified as one of the Principal Farmlands.
5401*	5401*	5401*
20529	20529	20529
5308	5308	5308
04-008	00-142**	
99-024	99-024	
5372	5372	
20380	20380	
20529	20592	
20814	20814	
01-014	01-014	
20501	20501	
20817	20817	
93101	93101	
5295	5295	
5358	5358	
5407	5407	
5370	5370	
94-009	94-009	
20428	20428	
04-057**	04-057**	
00-142**		
5295		
20429		
02-067		
5320		
5233		
04-008		

*Subject Property
**Cell Site

Appendix B

Cumulative Agricultural Impact Worksheet

Map	Square Inches		Scale	Scale	Area in feet		Area in acres	
			1"=xfeet	1=xunits				
5401	10.05		160		257280		5.906336	
20529	3.97		94.7		35603.32		0.81734	
5308	12.8		170.8		373409.8		8.572309	

Total Acreage Impacted 15.29599

Appendix C

I. Introduction

The California Department of Conservation developed the California Land Evaluation and Site Assessment (LESA) model (1997) to provide lead agencies with an optional methodology to determine whether impacts to agricultural resources are significant environmental effects. The creation of the LESA Model was the result of Senate Bill 850 in 1993. The bill directed the California Resources Agency, in consultation with the Governor's Office of Planning and Research, "to provide lead agencies with an optional methodology to ensure that significant effects...of agricultural land conversions are quantitatively and consistently considered in the environmental review process" (California Department of Conservation, Office of Land Conversion 1997). Therefore, the LESA model has been applied to this project to determine the significance of both on-site and off-site agricultural conversion.

II. Methodology

The methodology used for completing the LESA worsheets is based on the California Agricultural Land Evaluation and Site Assessment Model Instruction Manual (Ibid) available online at http://www.consrv.ca.gov/DLRP/qh_lesa.htm.

III. LESA Model Result

The final LESA model score for the project is 38.01. Based on the scoring decision table (below) included in the California Agricultural Land Evaluation and Site Assessment Model Instruction Manual (Ibid), the agricultural resources on the project site are not considered significant.

Total LESA SCORE	**Scoring Decision**
0 to 39 Points	*Not Considered Significant*
40 to 59 Points	*Considered Significant only if LE and SA subscores are each greater than or equal to 20 points*
60 to 70 Points	*Considered Significant unless either the LE or SA subscore is less than 20 points*
80 to 100 Points	*Considered Significant*

IV. References

California Department of Conservation, Office of Land Conversion, "California Agricultural Land Evaluation and Site Assessment Model Instruction Manual," 1997.

United States Department of Agriculture, Soil Survey for the San Diego Area, California. 1973. (soils.usda.gov)

V. Appendix – LESA model worksheets

Table 4. Site Assessment Worksheet 2. - Water Resources Availability

A	B	C	D	E
Project Portion	Water Source	Proportion of Project Area	Water Availability Score	Weighted Availability Score (C x D)
1	Vista Irrigation District	100%	90	90
2				
3				
4				
5				
6				
		(Must Sum to 1.0)	***Total Water Resource Score***	90

Table 8. Final LESA Scoresheet

A	B		C		D
Factor Name	Factor Rating (0-100 points)	X	Factor Weighting (Total = 1.00)	=	Weighted Factor Rating
Land Evaluation					
1. Land Capability Classification	<Line 1> 53.2	X	0.25	=	13.3
2. Storie Index Rating	<Line 2> 44.84	X	0.25	=	11.21
Site Assessment					
1. Project Size	<Line 3> 0	X	0.15	=	0
2. Water Resource Availability	<Line 4> 90	X	0.15	=	13.5
3. Surrounding Agricultural Lands	<Line 5> 0	X	0.15	=	0
4. Protected Resource Lands	<Line 6> 0	X	0.05	=	0
			Total LESA Score (sum of weighted factor ratings)		<Line 7> 38.01

REFERENCES

Written Works:

County of San Diego, Department of Weights and Measures, 2002 Crop Statistics & Annual Report

University of California, Agricultural Extension Service. Climates of San Diego County—Agricultural Relationships, November 1970.

United States Department of Agriculture, Soil Conservation Service and Forest Service. Soil Survey San Diego Area, California. December 1973

California Department of Conservation, Division of Resource Protection, Farmland Mapping and Monitoring Program. Soil Candidate Listing for Prime Farmland and Farmland of Statewide Importance—San Diego County

California Department of Conservation, Division of Resource Protection, Farmland Mapping and Monitoring Program. 2000-2002 Land Use Conversion, Table A-26, San Diego County.

Maps:

California Department of Conservation, Division of Resource Protection, Farmland Mapping and Monitoring Program. San Diego County Important Farmland 2002

County of San Diego, Department of Public Works, Mapping Section. North County Metropolitan Subregional Plan.

County of San Diego, Department of Public Works, Mapping Section. County of San Diego General Plan—Regional Land Use Element Map,

County of San Diego, Department of Public Works, Mapping Section. County of San Diego—Agricultural Preserves.

SanGis, County of San Diego General Plan 2020 Reference Maps for the North County Metropolitan Subregion as Follows:

Parcelization
Vegetation
Topography
North County Metropolitan Discretionary Project Status, August 2004